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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

NILE LEATHAM, and THE ESTATE OF  
MARIE LEATHAM-DAVIS,

Plaintiffs,

v.

SAFECO INSURANCE COMPANY OF  
AMERICA, a foreign entity; SAFECO  
INSURANCE COMPANY OF ILLINOIS, a  
foreign entity; LIBERTY INSURANCE  
CORPORATION, a foreign corporation; LM  
GENERAL INSURANCE COMPANY, a foreign  
corporation DOES I through X, inclusive; and  
ROE CORPORATIONS I through V, inclusive,

Defendants.

CASE NO.: 2:23-cv-01432-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND DEFENDANTS' TIME TO  
RESPOND TO FIRST AMENDED  
COMPLAINT**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Nile Leatham and the Estate of Marie Leatham-Davis (collectively "Plaintiffs") and Defendants Safeco Insurance Company of America ("SICA"), Safeco Insurance Company of Illinois ("SICI"), Liberty Insurance Corporation ("Liberty"), and LM General Insurance Company ("LM") (collectively "Defendants") by and through their respective counsel, that Defendants shall have until Monday, October 2, 2023 to respond to Plaintiffs' First Amended Complaint.

Defendants removed this action to this Court on September 13, 2023. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), Defendants' deadline to respond to the First Amended Complaint is September 20, 2023.

Good cause exists to extend this deadline. Counsel for Plaintiffs and Defendants have conferred and are reviewing an issue which may allow for a stipulated dismissal of some defendants without the need for motion practice. In order to facilitate this review, the parties agree that an additional ten days is necessary and appropriate under the circumstances. As a ten-day extension moves the deadline to Saturday, September 30, 2023, the parties agree that the deadline should be moved to Monday, October 2, 2023. Fed. R. Civ. P. 6(a)(1)(C).

Wherefore, the parties respectfully request that the Court extend Defendants time to respond to the First Amended Complaint until Monday, October 2, 2023.

BOWEN LAW OFFICES

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*Attorneys for Defendants*

### **ORDER**

IT IS SO ORDERED

DATED: September 22, 2023



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

As an employee of Clyde & Co US LLP, I certify that a copy of the foregoing  
**STIPULATION AND ORDER TO EXTEND DEFENDANTS' TIME TO RESPOND TO  
FIRST AMENDED COMPLAINT (First Request)** was served by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☒ **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: September 20, 2023

/s/ Jennifer Parsons  
An Employee of Clyde & Co US LLP